Law Offices of

## Donna R. Newman

Attorney at Law
20 Vesey Street, Suite 400
New York, New York 10007
Tel. 212-229-1516
Fax. 212-593-1844
cell: 201-306-4369

donnanewmanlaw@aol.com

Member: N.Y. & N.J. Bar

Via Email and ECF

May 26, 2022

The Honorable Lorna G. Schofield United States District Judge Southern District of New York United States Courthouse 40 Foley Square New York, New York 10007

Re: United States v. Michael Jackson 21 Cr. 386 (LGS)

Application Granted. The Clerk of the Court is directed to terminate the letter motion at docket number 37.

Dated: May 31, 2022 New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

With the consent of the Government, I write to request until Friday June 4<sup>th</sup> to file a response to the Government's motion for Mr. Jackson's remand as a result of his plea of guilty to a violation of 18 U.S.C. § 922(g)-a felon in possession of ammunition. Currently my response is due May 31, 2022. However, in as much as I have Second Circuit appellate brief due to be filed on May 31<sup>st</sup> and two sentencing memos due the next day, it is next to impossible for me to submit a response to the Government's motion. Wherefore, I respectfully request an additional four days to file a response to the Government's remand motion.

I thank the Court for its consideration of this request.

Respectfully,

/s/

Donna R. Newman

Cc: AUSA Josiah Pertz via email & ECF